

THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

**WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND
DEVELOPMENT,**
Plaintiff,

v.

**CANON INC. AND CANON U.S.A.,
INC.**
Defendants.

**CIVIL ACTION 6:20-cv-00980-ADA
CIVIL ACTION 6:20-cv-00981-ADA**

CANON INC.,
Third-Party Plaintiff,

CIVIL ACTION 6:20-cv-00980-ADA

v.

NXP USA, INC.,
Third-Party Defendant.

OPPOSED MOTION FOR LETTER OF REQUEST FOR FOREIGN DISCOVERY

Defendants Canon Inc. and Canon U.S.A., Inc. (collectively “Defendants”) seek foreign discovery from third party witnesses residing in Finland. Defendants have attached an Exhibit with a Letter of Request which includes Document Requests and Deposition Topics. Defendants respectfully request that the Court execute the Letter of Request attached as Exhibit A. Defendants further request that, after the Court has signed the Letter of Request, the Clerk of this Court authenticate the Court’s signature under the seal of this Court, and return the original signed and sealed executed Letter, and two certified copies of the signed and sealed executed Letters, to Defendants’ counsel, John Jackson, for delivery to the proper authority.

Dated: March 25, 2022

By: /s/ Richard F. Martinelli

Richard F. Martinelli (*pro hac vice*)
rmartinelli@orrick.com

Joseph A. Calvaruso (*pro hac vice*)
jcalvaruso@orrick.com

Orrick, Herrington & Sutcliffe LLP
51 West 52nd Street
New York, NY 10019-6142
Tel: (212) 506-5000
Fax: (212) 506-5151

John M. Jackson (Texas Bar No. 24002340)
jjackson@jw.com

Jackson Walker, LLP
2323 Ross Avenue, Suite 600
Dallas, TX 75201
Tel: (214) 953-6000
Fax: (214) 953-5822

Attorneys for Defendants Canon Inc. and Canon U.S.A., Inc.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Canon Inc. and Canon U.S.A., Inc. contacted counsel for Plaintiff regarding the foregoing Motion. Plaintiff did not provide an affirmative response to Canon Inc. and Canon U.S.A., Inc.'s request to resolve this matter (via email and subsequent phone call). Canon Inc. and Canon U.S.A., Inc. presume that Plaintiff opposes this motion.

/s/ John M. Jackson
John M. Jackson

CERTIFICATE OF SERVICE

The undersigned certifies that on March 25, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(b)(1).

/s/ John M. Jackson
John M. Jackson